

**Maryjane Kenney**

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**From:** Mary Michelman [msmichelman@comcast.net]  
**Sent:** Monday, September 22, 2008 3:11 PM  
**To:** Golden.Derrick@epamail.epa.gov; Board of Selectmen  
**Cc:** Jennifer.McSweeney@State.ma.us; Chris Allen; Stephen Anderson; Jane Ceraso; breagor@concordma.gov; okung@oto-env.com; Doug Halley; Steve Ledoux  
**Subject:** RE: W. R. Grace (Acton Plant) Superfund site - Town Comments

Hi Derrick,

Thank you for your September 17, 2008 email addressed to Lauren Rosenzweig, Chair of the Acton Board of Selectmen, and for the attachments. Given that ACES also commented on the recent detection of 1,4-Dioxane at AR-30, I am writing to clarify some of the specific concerns in ACES September 15, 2008 comments.

1. Clarification:

ACES first comment on the Monitoring Program Report, 2007 for the WR Grace Site, should have read:

(asterisks only included to point out the changes from the original text.)

<<"It is ACES understanding that the Acton Water District, (as well as the Town of Acton and ACES), learned of the \*2007\* 1,4-dioxane detections in the Northeast Area for the first time by reading the just released 2007 WR Grace Monitoring Report in August 2008. The well with the highest detection in the Northeast Area \*in 2007\*, AR-30D, is located adjacent to the Christofferson public well.">>

The two changes from the submitted comments are to add the words shown above with an asterisk on either side: \*2007\* and \*in 2007\*. The omission of these words was an editing oversight. (ACES was commenting on the information in the 2007 report, and thought the meaning would be understood in that context, especially since we have submitted comments in the past on 1,4-dioxane detections on the Grace Site and the need for additional sampling for this contaminant in proximity to the AWD public wells. We have appreciated EPA and WR Grace's responsiveness to those past comments.)

2. Quicker notification needed:

The point of ACES comments about the 2007 1,4-Dioxane detection is that there should be quicker notice, especially to the AWD when there is a detection of a contaminant that could be of concern to the AWD, whether that detection is from an annual monitoring round or some other sampling event.

The detection of 4.4ug/L of 1,4-dioxane at AR-30D warranted quicker notice to the Acton stakeholders, and especially to the AWD, given that it was higher than past detections in the Northeast Area (and was not J qualified), it exceeded the MA DEP guideline for drinking water, and the location was adjacent to the Christofferson public well. Previous detections were both lower and farther away from the public water supply wells.

3. 1,4-Dioxane sampling initiated under EPA's guidance:

ACES appreciates that since the 2005 ROD, EPA has ensured that WR Grace test for 1,4-Dioxane in at least a portion of the monitoring wells at the WR Grace Superfund Site, and that when the contaminant was found in the Northeast Area and elsewhere on the site in 2006, the Acton Water District was notified within four months of the samples having been taken. (The Town and ACES were cc'd on the notification letter.) The samples were taken in May 2006, WR Grace sent a notification letter to EPA in August 2006, and EPA in turn notified the DEP of the detections, and sent a letter to the Acton Water District in September 2006.

In contrast, approximately 10 months elapsed between the 2007 sampling round and the Acton stakeholders, including the AWD, learning that 1,4-dioxane had been detected at a monitoring well adjacent to a public water supply well, at a level higher than the MA DEP drinking water guideline of 3.0ug/L.

4. Sentinel wells:

Since the initial 1,4-dioxane detections, additional sampling has been done under EPA guidance in select monitoring wells that could act as "sentinel wells" for the Acton Water

District because of their locations in relation to the public wells. ACES appreciates EPA's role in ensuring that this additional sampling is done, and looks forward to a timely reporting of the sampling results from the 2008 monitoring round as well as other future monitoring.

5. Please also see and consider our September 15, 2008 comments on the Monitoring Program Report, 2007 for the WR Grace Site.

We will try and be more precise with future comments, to avoid confusion.

Thank you for your consideration.

Sincerely,

Mary

Mary Michelman, ACES

-----Original Message-----

From: Golden.Derrick@epamail.epa.gov [mailto:Golden.Derrick@epamail.epa.gov]

Sent: Wednesday, September 17, 2008 5:04 PM

To: bos@acton-ma.gov

Cc: 'Jennifer.McSweeney@State.ma.us'; Mary Michelman; Chris Allen; Stephen Anderson; Jane Ceraso; 'breagor@concordma.gov'; 'okung@oto-env.com'; Doug Halley; Steve Ledoux

Subject: Re: W. R. Grace (Acton Plant) Superfund site - Town Comments

Dear Ms. Lauren Rosenzweig,

On September 12, 2008, EPA and MassDEP received, via e-mail, the attached comments dated September 22, 2008, from the Town of Acton on the 2007 Annual Groundwater Monitoring Report for the W. R. Grace site.

Thank you for providing EPA & MassDEP with these comments so that we may consider them for inclusion with our final comments to Grace.

The Town expressed concern about the detection of 1,4 Dioxane in the Northeast area as well as a concern that the Town was not notified about the detection of 1,4 Dioxane until August 2008. I would like to clarify that on 09/12/06, two years ago, EPA and MassDEP notified the Acton Water District, the Town of Acton and ACES concerning the detection of 1,4 Dioxane in the Northeast Area. For your files, I have attached the 9/12/06 Dioxane notification letter to this e-mail.

(See attached file: WR Grace 9\_2006 1,4 dioxane results.pdf) (See attached file: WR Grace Town cmmnt on 2007 GW mon report 9\_2008.pdf)

Sincerely

Derrick Scott Golden

Remedial Project Manager

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